

FILED
U.S. DISTRICT COURT
SAVANNAH DIV.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

2009 MAY -7 PM 3:40

UNITED STATES OF AMERICA

v.

AMOS MEYERS

MARVIN MAURICE POWE

) INDICTMENT NO. **CR1097 GA 62**

) VIO: 18 U.S.C. § 1349

) Wire Fraud Conspiracy

) 18 U.S.C. § 1343

) Wire Fraud

) 18 U.S.C. § 1028A

) Aggravated Identity Theft

Count One

18 U.S.C. § 1349

Wire Fraud Conspiracy

THE GRAND JURY CHARGES THAT:

1. From in or about June 2005 and continuing to in or about October, 2006, in Richmond County, in the Southern District of Georgia and elsewhere, the defendants:

AMOS MEYERS and MARVIN MAURICE POWE

did knowingly and willfully combine, conspire, confederate, and agree with Z.Z.B., J.L.B., and others to commit Wire Fraud, that is, to devise and intend to devise a scheme and artifice to defraud financial institutions, and to obtain and attempt to obtain money and property from financial institutions by means of materially false and fraudulent pretenses and representations, and for the purpose of executing such, did transmit and cause to be transmitted writings, signs, signals, pictures, and sounds by means of a wire communication in interstate commerce, in violation of Title 18, United States Code, Section 1343.

2. It was part of the conspiracy and scheme and artifice to defraud and obtain money by means of materially false and fraudulent pretenses, representations, promises, and omissions, that the defendants and their co-conspirators would, knowingly and with the intent to deceive:

A. Use the identity information, including the social security number and date of birth, of F.J.M., on a credit application at Stokes Hodges Auto Mall, in order to falsely and fraudulently obtain an auto loan in the amount of approximately \$24,789.13 for the purchase of a 2003 Jaguar X-type luxury vehicle;

B. Use the identity information, including the social security number and date of birth, of M.H., on a credit application at Stokes Hodges Auto Mall, in order to falsely and fraudulently obtain auto loans in the amounts of approximately \$40,450.15 for the purchase of a 2003 Hummer H2 sport-utility vehicle and \$36,755.24 for the purchase of a 2002 Mercedes Benz Model S luxury vehicle; and

C. Commit the acts described in Counts Two through Four, which are hereby incorporated into this part as if fully set forth herein.

All done in violation of Title 18, United States Code, Section 1349.

Count Two
18 U.S.C. § 1343
Wire Fraud

THE GRAND JURY FURTHER CHARGES THAT:

3. Re-alleging and incorporating herein by reference Count One of this Indictment as if fully set forth herein, on or about June 27, 2005, in the Southern District of Georgia and elsewhere, the defendants:

AMOS MEYERS and MARVIN MAURICE POWE

for the purpose of executing, and attempting to execute, the scheme and artifice to defraud and to obtain money by materially false and fraudulent pretenses, representations and promises

described in Count One, did cause to be transmitted, by means of a wire communication in interstate commerce, the following described writings, signs, signals, pictures, and sounds, to-wit:

SOURCE	RECIPIENT	ITEM WIRED
HSBC (New York)	Wachovia Bank (Georgia)	\$24,789.13 for the purchase of a 2003 Jaguar X-type luxury vehicle

All done in violation of Title 18, United States Code, Section 1343.

Counts Three and Four

18 U.S.C. § 1343

Wire Fraud

THE GRAND JURY FURTHER CHARGES THAT:

3. Re-alleging and incorporating herein by reference Count One of this Indictment as if fully set forth herein, on or about the dates listed below, in the Southern District of Georgia and elsewhere, the defendant:

AMOS MEYERS

for the purpose of executing, and attempting to execute, the scheme and artifice to defraud and to obtain money by materially false and fraudulent pretenses, representations and promises described in Count One, did cause to be transmitted, by means of a wire communication in interstate commerce, the following described writings, signs, signals, pictures, and sounds, to-wit:

Count	DATE	SOURCE	RECIPIENT	ITEM WIRED
3	10/25/2006	Fifth Third Bank (Ohio)	Wachovia Bank (Georgia)	\$40,450.15 for the purchase of a 2003 Hummer H2 sport-utility vehicle

Count	DATE	SOURCE	RECIPIENT	ITEM WIRED
4	10/25/2006	Wells Fargo Bank (Minnesota)	Wachovia Bank (Georgia)	\$36,755.24 for the purchase of a 2002 Mercedes Benz Model S luxury vehicle

All done in violation of Title 18, United States Code, Section 1343.

Count Five

18 U.S.C. § 1028A(a)
Aggravated Identity Theft

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2005, in the Southern District of Georgia and elsewhere, the defendants:

AMOS MEYERS and MARVIN MAURICE POWE

did knowingly use, without lawful authority, a means of identification of another person, to wit, the social security number and date of birth of F.J.M., during and in relation to a felony violation of Title 18, United States Code, Sections 1343 and 1349, specifically, Wire Fraud Conspiracy and Wire Fraud, as described in Counts One and Two of this Indictment.

All in violation of Title 18, United States Code, Section 1028A(a).

Count Six

18 U.S.C. § 1028A(a)
Aggravated Identity Theft


THE GRAND JURY FURTHER CHARGES THAT:

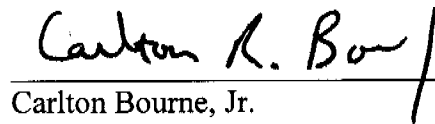
On or about October 9, 2006, in Richmond County, in the Southern District of Georgia and elsewhere, the defendant,


AMOS MEYERS

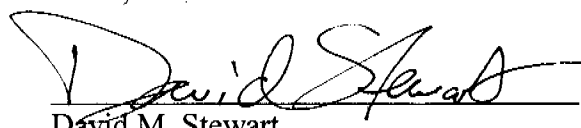
did knowingly use, without lawful authority, a means of identification of another person, to wit, the social security number and date of birth of M.H., during and in relation to a felony violation of Title 18, United States Code, Sections 1343 and 1349, specifically, Wire Fraud Conspiracy and Wire Fraud, as described in Counts One, Three, and Four of this Indictment.

All in violation of Title 18, United States Code, Section 1028A(a).


Edmund A. Booth, Jr.
United States Attorney


Carlton Bourne, Jr.
Assistant United States Attorney
Deputy Chief, Criminal Division


James D. Durham
Assistant United States Attorney
Chief, Criminal Division


David M. Stewart
Assistant United States Attorney
Lead Counsel